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8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2010-649**

12 **JACQUELINE BLUNT**  
13 **5546 Guadalupe Court**  
**Concord, CA 94521**

**A C C U S A T I O N**

14 **Registered Nurse License No. 464908**

15 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., R.N. (Complainant) brings this Accusation solely in her  
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
22 of Consumer Affairs.

23 2. On or about March 31, 1991, the Board of Registered Nursing issued Registered  
24 Nurse License Number 464908 to Jacqueline Blunt (Respondent). The Registered Nurse License  
25 was in full force and effect at all times relevant to the charges brought here and will expire on  
26 November 30, 2010, unless renewed.

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## JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

## STATUTORY PROVISIONS

6. Section 2761 of the Code states, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

...

"(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

## COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINARY ACTION  
(Disciplinary Action by another State Health Care Professional Licensing Board)  
(Bus. & Prof. Code § 2761(a)(4))

8. Respondent has subjected her registered nurse license to disciplinary action under Section 2761(a)(4) of the Code in that another state health care professional licensing board took disciplinary action against her Arizona registered nurse license. Specifically, on or about November 18, 2009, in the case entitled, "*In the Matter of Registered Nurse License No. RN10193 issued to Jacqueline Blunt*," the Arizona State Board of Nursing revoked Respondent's registered nurse license. The disciplinary action was based on Respondent's violating Arizona Revised Statute (A.R.S.) section 32-1663(D) as defined in A.R.S. § 32-1601(16)(d) and (j); R4-19-403(B)(7) (8a.) (9) (25a) and (31) (adopted effective November 13, 2005). (A copy of the disciplinary decision of the Arizona State Board of Nursing is attached as Exhibit A and is incorporated by reference as though fully set forth.)

9. The Arizona State Board of Nursing concluded that the conduct and circumstances described in the Findings of Fact constitute sufficient cause pursuant to A.R.S. § 32-1664(N) to suspend or revoke the license of Jacqueline Blunt to practice as a registered nurse. Further, the Findings of Fact supporting the conclusions that Respondent engaged in unprofessional conduct and violated the above laws and administrative regulations include, but are not limited to:

a. From on or about April 2008 until October 9, 2008, Respondent was employed as a nurse at Westminister Village in Scottsdale, Arizona and committed multiple documentation errors on patient medical records, including, but not limited to the following:

1. On or about October 4, 2008, and October 5, 2008, Respondent made illegible nursing note entries in the medical record for resident M. B.

2. Respondent failed to make any medical record entries for resident A. A. on October 4, 2008, and October 5, 2008.

3. Respondent failed to make any medical record entries for resident P. G. on October 5, 2008.

4. On October 5, 2008, Respondent made illegible and nonsensical nursing note entries for residents F. S., J. H., J. J., and E. R.

5. On October 5, 2008, Respondent made illegible and nonsensical nursing note entries for resident P. G.

b. On October 6, 2008, during the morning shift change, Respondent was observed as being diaphoretic, with an unsteady gait, red and glassy eyes, and fumbling with her patient report papers. According to witnesses, Respondent had slurred speech and was providing misinformation regarding the patients during her shift report. Respondent had clocked out and left the premises before security could be called for a drug screen.

c. On or about October 8, 2008, Respondent reported for duty and was observed as having an unsteady gait and "fuzzy" speech. Respondent was requested to meet with Tim Kersey, Administrator, and the Director of Nursing. Respondent appeared confused and inappropriate in her responses. Respondent was asked to undergo a urine drug screen (UDS), which she refused.

d. On or about October 9, 2008, Respondent was terminated for refusing to undergo a UDS. Respondent is not eligible for rehire.

e. Pursuant to A.R.S. § 32.1642, Respondent was required to renew her license on or before July 1, 2009, and failed to do so.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 464908, issued to Jacqueline Blunt (Respondent);

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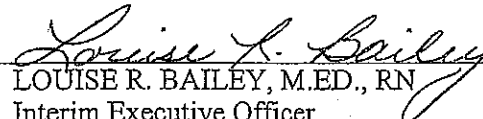
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1           2.     Ordering Respondent to pay the Board of Registered Nursing the reasonable costs of  
2 the investigation and enforcement of this case, pursuant to Business and Professions Code section  
3 125.3; and

4           3.     Taking such other and further action as deemed necessary and proper.

5  
6 DATED: \_\_\_\_\_

6/17/10



LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

11 SF2010200686  
12 CR: 06/02/10